

## UNITED STATES DISTRICT COURT

for the

Western District of Michigan

United States of America

v.

JAMES VERNE RUSSELL

Case No.

1:19-mj-103

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Summer of 2018 in the county of Muskegon in the  
WESTERN District of MICHIGAN, the defendant(s) violated:

## Code Section

## Offense Description

18 USC 2251(a) and (e)  
 18 USC 2252A(a)(2) & (b)(1)  
 18 USC 2252A(a)(5)(B) & (b)(2)

Sexual Exploitation of a Child/Production of Child Pornography  
 Receipt, transportation, and distribution, and conspiracy to receive, transport,  
 and distribute, child pornography; and  
 Possession and access, or attempted access, with intent to view child  
 pornography

This criminal complaint is based on these facts:

SEE ATTACHED CONTINUATION OF COMPLAINT

☒ Continued on the attached sheet.
  
 Complainant's signature

Timothy Simon, Special Agent FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

March 27, 2019

City and state: Grand Rapids, Michigan
  
 Judge's signature

Ellen S. Carmody, U.S. Magistrate Judge

Printed name and title